



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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JUN 7 2006

Ref: 8EPR-N

R2 Grizzly Bear FP Amendments
c/o USFS Content Analysis Team
P.O. Box 22810
Salt Lake City, UT 84122-2810

Re: Forest Plan Amendment for Grizzly Bear
Conservation for the Greater Yellowstone
Area National Forests - Final Environmental
Impact Statement, CEQ# 20060172

Dear Analysis Team:

The Environmental Protection Agency (EPA)-Region 8 has reviewed the Final Environmental Impact Statement (FEIS) for the Forest Plan Amendments for Grizzly Bear Conservation in the Greater Yellowstone Area National Forests. The EPA reviews FEIS documents in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major federal agency action. This review is focused primarily on the response to EPA's comments on the Draft EIS (DEIS).

The EPA supports the stated Purpose and Need and proposed management activities in the FEIS and its Selected Alternative. The U.S. Forest Service is to incorporate management direction that conserves and promotes recovery of the grizzly bear in the Greater Yellowstone Area National Forests. That direction is to reduce or eliminate some adverse effects from land management activities on the six affected National Forests in Idaho, Montana, and Wyoming and to provide for habitat and food security in Management Situation 1 areas.

The FEIS anticipates that human use of these Forests will increase over time with increasing population. The FEIS also recognizes that increased human population and use will likely affect grizzly bears in the analysis area. The FEIS's primary response to this anticipated stress is to hold the number and capacity of developed recreation facilities to 1998 levels. In other words, the selected alternative (Alt. 2-modified) limits the capacity of recreation facilities (e.g. number of roads, trails and campsites), but the selected alternative does not limit or require mitigation for increases in the *amount of use* of those facilities. Given the other major uncertainties identified in the FEIS (e.g. food sources, private land use, etc.), we encourage the Yellowstone Grizzly Coordinating Committee to monitor the level of use of the existing facilities



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to determine if increased user density, frequency or duration are adversely affecting the grizzly population.

The EPA appreciates the improvements made in Alternative 2 - Modified, compared to Alternative 2 in response to our comments (and other's) on the DEIS. Alternative 2 modified does not incorporate all of the available protection measures EPA identified in our DEIS comments to improve the likelihood that grizzly populations are sustained. In particular, should the current management plan not meet its grizzly population goals, we hope that the USFS will consider additional measures to reduce conflicts with grazing allotments (closure or conversion to steer operations) and impacts from mineral and energy development. The FEIS does not make a clear case that such measures are either unreasonable or unwarranted.

Thank you for responding to our concerns with the Draft EIS and for considering these additional comments. If you have any questions or would like to discuss our comments, please contact me (303-312-6004) or Phil Strobel (303-312-6704) of my staff.

Sincerely,



Larry Szoboda

Director, NEPA Program

Office of Ecosystems Protection and Remediation